



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

OCT 21 2011

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard M. Zavoda
Environmental Manager
ArcelorMittal Cleveland Inc.
3060 Eggers Avenue
Cleveland, Ohio 44105

Dear Mr. Zavoda:

This is to advise you that the United States Environmental Protection Agency (EPA) has determined that the ArcelorMittal Cleveland Inc. (ArcelorMittal) located at 3060 Eggers Avenue in Cleveland, Ohio, (Cleveland Facility) is in violation of the Clean Air Act (the CAA) and associated state pollution control requirements.

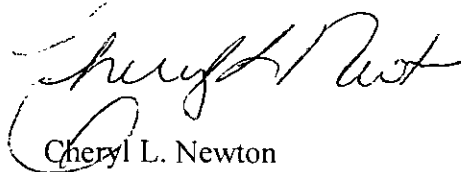
The EPA is sending this Notice of Violation and Finding of Violation (NOV/FOV) to notify you that at the Cleveland Facility we have identified violations of the facility's Title V Permit, the National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities at 40 C.F.R. Part 63, Subpart FFFFF, and the Ohio State Implementation Plan.

Section 113 of the CAA gives the EPA several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action and bringing a judicial criminal action. The option we select, in part, depends on the efforts taken by ArcelorMittal to correct the alleged violations and the timeframe in which you can demonstrate and maintain continuous compliance with the requirements cited in the NOV/FOV.

Before we determine which enforcement option is appropriate, we are offering you the opportunity to request a conference with us about the violations alleged in the NOV/FOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

The EPA contacts in this matter are Brian Dickens and Monica Onyszko. You may contact either Mr. Dickens at 312-886-6073 or Ms. Onyszko at 312-353-5139 if you wish to request a conference. Legal questions should be directed to Cynthia A. King, Associate Regional Counsel, at 312-886-6831. The EPA hopes that this NOV/FOV will encourage ArcelorMittal's compliance with the requirements of the CAA.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton". The signature is fluid and cursive, with the first name "Cheryl" being more prominent and the last name "Newton" following in a similar style.

Cheryl L. Newton
Director
Air and Radiation Division

Enclosure

cc: George P. Baker, Chief
Cleveland Department of Public Health & Welfare

IN THE MATTER OF:)	
)	
ArcelorMittal Cleveland Inc.)	NOTICE OF VIOLATION AND
Cleveland, Ohio)	FINDING OF VIOLATION
)	
Proceedings Pursuant to)	EPA-5-12-OH-01
the Clean Air Act,)	
42 U.S.C. §§ 7401 <u>et seq.</u>)	
)	

- a. Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including “major sources.” Pursuant to Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), on July 21, 1992, 57 Fed. Reg. 32295, the EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency. These regulations are codified at 40 C.F.R. Part 70.
- b. 40 C.F.R. § 70.2 defines “major source,” in part, as any stationary source belonging to a single major industrial grouping and that directly emits or has the potential to emit 100 tons per year (tpy) of any air pollutant, as defined under Section 302 of the CAA, 42 U.S.C. § 7602.
- c. 40 C.F.R. § 70.7(b) states that no source subject to Title V may operate the source except in compliance with a Title V permit.

- d. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), states that after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate the source except in compliance with its Title V permit.
- e. The EPA approved Ohio's Part 70 program, codified at Ohio Administrative Code (OAC) Rule 3745-77, on August 15, 1995, 60 Fed. Reg. 42045, with an effective date of October 1, 1995.
- f. The regulation at 40 C.F.R. § 70.6(b)(1) specifies that all terms and conditions in a permit issued under a Part 70 program, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA under the CAA.
- g. On August 15, 1995, 60 Fed. Reg. 42045, the EPA approved OAC 3745-77-07 which requires that each Title V Permit shall include all emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements.
- h. On November 5, 2004, the Ohio Environmental Protection Agency (OEPA) issued Final Title V Permit No. 13-18-00-1613 to ISG Cleveland Inc., ArcelorMittal's predecessor.
- i. On May 27, 1994, 59 Fed. Reg. 27464, the EPA approved OAC Rule 3745-17 as part of the federally enforceable SIP for the State of Ohio. OAC Rule 3745-17 regulates the emission of particulate matter from stationary sources.
- j. Part III of the Title V Permit sets forth the terms and conditions for the emission units at the Cleveland Facility.
- k. Part III.A.I.1 of the Title V Permit for Emission Units P903, P904, P925, P926, F011, F029, and P267, among others, prohibits in accordance with OAC 3745-17-07(A)(1), visible particulate emissions from any stack in excess of 20 percent opacity as a six-minute average for more than six consecutive minutes in any sixty minutes.
- l. Part III.A.I.1. of the Title V Permit for Emission Units P903, P904, P925, P926, F011, F029, and P267, among others, prohibits, in accordance with OAC 3745-17-07(B)(1), visible particulate emissions from any fugitive dust source in excess of 20 percent opacity as a three-minute average.
- m. Part III.A.I.1. of the Title V Permit for Emission Unit P903, among others, requires, under OAC 3745-17-08(B)(3), the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust.

- n. Part III.A.2.2.a.i. of the Title V permit for Emissions Units P903 and P904 requires that ArcelorMittal shall minimize or eliminate visible emissions of fugitive dust through the employment of reasonably available control measures including, but not limited to the use of a Passive Emission Control system.

Iron and Steel NESHAP

- a. The Cleveland facility is subject to the Iron and Steel NESHAP, 40 C.F.R. Part 63, Subpart FFFFF.
- b. The following requirements are found in the Iron and Steel NESHAP:
 - i. 40 C.F.R. § 63.7790(a) - You must meet each emission limit and opacity limit in Table 1 to this subpart that applies to you;
 - ii. 40 C.F.R. § 63.7800(a) - You must at all times operate and maintain your affected source, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by this subpart;
 - iii. 40 C.F.R. § 63.7800(b) - You must prepare and operate at all times according to a written operation and maintenance plan for each capture system or control device subject to an operating limit in § 63.7790(b);
 - iv. 40 C.F.R. § 63.7833(a) - You must demonstrate continuous compliance for each affected source subject to an emission or opacity limit in 40 C.F.R. § 63.7790(a) by meeting the requirements in Table 3 to this subpart (which specifies opacity limits associated with certain equipment); and
 - v. 40 C.F.R. § 63.7842 requires that sources must document and maintain records of certain information related to its equipment, including startups, shutdowns and malfunctions of that equipment.

Ohio SIP

- a. On May 27, 1994, 59 Fed. Reg. 27464, the EPA approved OAC Rule 3745-17 as part of the federally enforceable SIP for the State of Ohio. OAC Rule 3745-17 regulates the emission of particulate matter from stationary sources.
- b. OAC 3745-17-07(A)(1) prohibits visible particulate emissions from any stack in excess of 20 percent opacity as a six minute average.. Opacity may exceed 20 percent, but not more than 60 percent, as a six minute average once in any sixty minute period.

- c. OAC 3745-17-07(B)(1) prohibits visible particulate emissions from any fugitive dust source in excess of 20 percent opacity as a three minute average.
- d. OAC 3745-17-08(B)(3) requires the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust.
- e. As required by Part I.A.1c.iv. of the Cleveland Facility's Title V permit, ArcelorMittal must submit compliance monitoring reports which are certified to be true, accurate and complete.
- f. Section 113(a)(1)-(3) of the CAA, 42 U.S.C. § 7413(a)(1)-(3), authorizes the Administrator to initiate an enforcement action whenever, on the basis of any available information, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of, among others, any implementation plan or permit, Title I or Title V of the CAA, or any rule promulgated, issued or approved under Title I or Title V of the CAA.

II. BASIS FOR VIOLATIONS

The violations alleged in this NOV/FOV are based on the EPA's review of the following:

- a. Quarterly Deviation and Compliance Monitoring Report: First Quarter 2007;
- b. Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2007;
- c. Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2007;
- d. Quarterly Deviation and Compliance Monitoring Report: Fourth Quarter 2007;
- e. Quarterly Deviation and Compliance Monitoring Report: First Quarter 2008;
- f. Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2008;
- g. Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2008;
- h. Quarterly Deviation and Compliance Monitoring Report: Fourth Quarter 2008;
- i. Quarterly Deviation and Compliance Monitoring Report: First Quarter 2009;
- j. Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2009;
- k. Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2009;
- l. Quarterly Deviation and Compliance Monitoring Report: Fourth Quarter 2009;

- m. Quarterly Deviation and Compliance Monitoring Report: First Quarter 2010;
- n. Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2010;
- o. First Half 2007 Iron and Steel MACT/NESHAP Semiannual Report;
- p. Second Half 2007 Iron and Steel MACT/NESHAP Semiannual Report;
- q. First Half 2008 Iron and Steel MACT/NESHAP Semiannual Report;
- r. First Half 2009 Iron and Steel MACT/NESHAP Semiannual Report;
- s. Second Half 2009 Iron and Steel MACT/NESHAP Semiannual Report;
- t. First Half 2010 Iron and Steel MACT/NESHAP Semiannual Report;
- u. August 13, 2009 Boiler D malfunction notice;
- v. August 24, 2009 Boiler D malfunction notice;
- w. September 14, 2009 No. 1 BOF malfunction notice;
- x. September 16, 2009 No. 1 BOF malfunction notice;
- y. September 22, 2009 Boiler D malfunction notice;
- z. November 5, 2009 No. 1 BOF Shop Hot Metal Reladle Station malfunction notice;
- aa. November 23, 2009 No. 1 BOF Shop Hot Metal Reladle Station malfunction notice;
- bb. February 2, 2010 No. 1 BOF malfunction notice; and
- cc. March 3, 2010 No. 1 BOF malfunction notice.

III. EXPLANATION OF VIOLATIONS

The EPA found the following violations at the ArcelorMittal Cleveland Facility:

- a. #1 BOF Shop (P905/P906) Excess Opacity at Roof Monitor and Operation and Maintenance Plan Deviation (Operation without Controls)

Regulated by: Title V Permit, Part III.A.1.1

Iron and Steel NESHAP, 40 C.F.R. § 63.7790(a), Tables 1 and 3
 Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)

OAC Rule 3745-17-07(B)

Sources: Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2007
First Half 2007 Iron and Steel NESHAP Semiannual Report
Quarterly Deviation and Compliance Monitoring Report: First Quarter 2010
Iron and Steel NESHAP Semiannual Report: First Half 2010
March 3, 2010 No. 1 BOF malfunction notice

Reported By	Date (Start and Stop)	Exceedance
ISG Cleveland	May 16, 2007	21.7%
	ISG Cleveland reported that poor quality scrap caused excess emissions.	
ArcelorMittal	February 24, 2010 – 12:16 February 24, 2010 – 12:20	NA
	Hot metal was transferred to a steel ladle within the BOF building for one heat without the benefit of baghouse draft.	

- b. #1 BOF Shop Hot Metal Transfer (F011) Operation and Maintenance Plan Deviation (Operation without Controls)

Regulated by: Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)
Title V Permit, Part III.A.1.1

Sources: Iron and Steel NESHAP Semiannual Report: First Half 2007
Iron and Steel NESHAP Semiannual Report: Second Half 2009
November 5, 2009 No. 1 BOF Shop Hot Metal Reladle Station malfunction notice
November 23, 2009 No. 1 BOF Shop Hot Metal Reladle Station malfunction notice

Reported By	Date (Start and Stop)	
ISG Cleveland	April 18, 2007	
	ISG Cleveland reported it performed hot metal transfer without a control. ISG Cleveland claimed that the exceedance was caused by malfunction, but the same equipment failure occurred on March 29, 2007 and was evidently not repaired.	
ArcelorMittal	November 3, 2009 – 09:00 November 3, 2009 – 10:30	

Reported By	Date (Start and Stop)	
	A hot metal transfer car cable within the reladle system failed and prevented the use of the normal hot metal transfer location. Hot metal was transferred without the use of the baghouse control device.	
ArcelorMittal	November 20, 2009 – 10:52 November 20, 2009 – 12:00	
	A hot metal transfer occurred without the use of the baghouse pollution control device.	

c. #1 BOF (F011) Hot Metal Transfer Baghouse Excess Opacity via COMS

Regulated by: Title V Permit, Section III.A.1.1
OAC Rule 3745-17-07(A)

Sources: Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2007
Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2009
Quarterly Deviation and Compliance Monitoring Report: First Quarter 2010
September 14, 2009 No. 1 BOF malfunction notice
September 16, 2009 No. 1 BOF malfunction notice
February 2, 2010 No. 1 BOF malfunction notice

Reported By	Date	Start Time	Duration	Opacity	Cause
ISG Cleveland	July 19, 2007	09:36	6 minutes	33%	Bag leaks
ISG Cleveland	September 15, 2007	05:00	6 minutes	27%	Bag leaks
ISG Cleveland	September 16, 2007	01:42	6 minutes	30%	Bag leaks
ISG Cleveland	September 16, 2007	03:12	6 minutes	24%	Bag leaks
ArcelorMittal	September 4, 2009	13:24	6 minutes	34.7%	No. 2 and No. 3 baghouse fans were restarted after being inactive for more than a few months

Reported By	Date	Start Time	Duration	Opacity	Cause
ArcelorMittal	September 14, 2009	10:48	6 minutes	23.8%	No. 1 and No. 4 baghouse fans were restarted after being inactive for more than a few months
ArcelorMittal	January 24, 2010	08:48	6 minutes	42.9%	Accumulated baghouse material inadvertently flowed through an inspection port and became re-entrained in the baghouse fan ductwork
ArcelorMittal	January 24, 2010	08:54	6 minutes	27.2%	Accumulated baghouse material inadvertently flowed through an inspection port and became re-entrained in the baghouse fan ductwork

- d. #1 BOF Shop (F011) Hot Metal Transfer Baghouse Failure to Meet Draft Static Pressure Hourly Average Minimum

Regulated by: Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)

Sources: Iron and Steel NESHAP Semiannual Report: First Half 2007
Iron and Steel NESHAP Semiannual Report: Second Half 2007
Iron and Steel NESHAP Semiannual Report: First Half 2008
Iron and Steel NESHAP Semiannual Report: Second Half 2009
Iron and Steel NESHAP Semiannual Report: First Half 2010

Reported By	Date	Duration
ISG Cleveland	January - June 2007	>50 hours
ISG Cleveland	July 9 - October 13, 2007	20 hours
ArcelorMittal	January 6 - June 29, 2008	>50 hours
ArcelorMittal	October 1 - December 31, 2009	38 hours
ArcelorMittal	January 1 - June 13, 2010	25 hours

e. #2 BOF Shop (P925/P926) Excess Opacity at Roof Monitor

Regulated by: Iron and Steel NESHAP, 40 C.F.R. § 63.7790(a), Tables 1 and 3
Title V Permit, Part III.A.1.1
OAC Rule 3745-17-07(B)

Source: Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2007

Reported By	Date	Exceedance
ISG Cleveland	June 26, 2007	21.3%

f. #2 BOF Shop (P925/P926) North and South Stack Electrostatic Precipitator
Excess Opacity via Continuous Opacity Monitoring Systems (COMS)

Regulated by: Title V Permit, Part III.A.1.1
OAC Rule 3745-17-07(A)

Sources: Quarterly Deviation and Compliance Monitoring Report: Second Quarter 2007
Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2007
Quarterly Deviation and Compliance Monitoring Report: Fourth Quarter 2007
Quarterly Deviation and Compliance Monitoring Report: First Quarter 2008
Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2008

North Stack

Reported By	Date	Start Time	Duration	Opacity	Cause
ISG Cleveland	April 14, 2007	06:30	6 minutes	38.6%	First start of ID fan with no draft
ISG Cleveland	April 14, 2007	14:36	6 minutes	21.1%	First start of ID fan with no draft
ISG Cleveland	April 16, 2007	05:30	6 minutes	20.1%	Testing draft 95 furnace
ISG Cleveland	December 21, 2007	18:54	6 minutes	51%	Startup 10 fan pre production startup
ISG Cleveland	December 23, 2007	08:54	6 minutes	26%	Testing draft pre production startup
ArcelorMittal	January 30, 2008	08:48	6 minutes	23%	Process startup
ArcelorMittal	February 21, 2008	13:12	6 minutes	22%	Inadequate sprays

Reported By	Date	Start Time	Duration	Opacity	Cause
ArcelorMittal	March 8, 2008	07:12	6 minutes	22%	Unknown
ArcelorMittal	March 11, 2008	14:48	6 minutes	24%	Unknown
ArcelorMittal	March 17, 2008	05:36	6 minutes	22%	Unknown
ArcelorMittal	March 17, 2008	15:12	6 minutes	22%	Unknown
ArcelorMittal	March 25, 2008	10:04	6 minutes	25%	9 ID fan shut down

South Stack

Reported By	Date	Start Time	Duration	Opacity	Cause
ISG Cleveland	April 14, 2007	06:30	6 minutes	94.7%	First start of ID fan with no draft
ISG Cleveland	April 14, 2007	06:36	6 minutes	63.7%	First start of ID fan with no draft
ISG Cleveland	April 16, 2007	05:30	6 minutes	25.1%	Testing draft 95 furnace
ISG Cleveland	May 31, 2007	09:18	6 minutes	78.8%	PM service and testing ID fan
ArcelorMittal	February 19, 2008	14:48	6 minutes	23%	Unknown
ArcelorMittal	July 16, 2008	18:54	6 minutes	31%	Cleaning #6 fan, all fields on and BOF not operating
ArcelorMittal	August 28, 2008	04:24	6 minutes	23%	Unknown

g. C5 (P903) Blast Furnace Casthouse Operation without Controls

Regulated by: Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)
Title V Permit, Part III.A.1.1, Part III.A.2.2.a
OAC Rule 3745-17-08(B)

Sources: Iron and Steel NESHAP Semiannual Report: First Half 2007
Iron and Steel NESHAP Semiannual Report: First Half 2008

Reported By	Date (Start and Stop)	
ISG Cleveland	June 20, 2007	
	ISG Cleveland reported it had cast the furnace without the trough hood in place, which is not in accordance	

	with its operations and maintenance plan.	
ArcelorMittal	March 7, 2008 – 20:38 March 7, 2008 – 22:15	
	Casting occurred without the use of a trough cover for part of one cast due to a power outage caused by an electrical ground failure of the monorail hoist trolley system that is used to lower the trough cover into position.	
ArcelorMittal	March 22, 2008 – 12:40 March 22, 2008 – 14:40	
	Casting occurred without the use of a trough cover for one cast due to a mechanical failure of the trough of the monorail hoist trolley system cable used to lower the trough cover.	

h. C6 (P904) Blast Furnace Casthouse Operation without Controls

Regulated by: Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)
Title V Permit, Part III.A.1.1, Part III.A.2.2.a
OAC 3745-17-08(B)

Sources: Iron and Steel NESHAP Semiannual Report: Second Half 2007
Iron and Steel NESHAP Semiannual Report: First Half 2008

Reported By	Date (Start and Stop)	
ISG Cleveland	September 16, 2007	
	ISG Cleveland reported it had cast the furnace without the trough cover in place, which is not in accordance with its operations and maintenance plan.	
ArcelorMittal	March 22, 2008 – 13:15 March 22, 2008 – 13:20	
	A bottlecar containing molten iron experienced a breakout at approximately 13:15. Iron from the bottlecar spilled onto the ground.	
ArcelorMittal	June 10, 2008 – 18:10 June 10, 2008 – 18:20	
	A bottlecar containing molten iron experienced a breakout at approximately 18:10. Iron from the bottlecar spilled onto the ground.	

i. Boiler D (B004) Excess Opacity via COMS

Regulated by: Title V Permit, Part III.A.1.1
OAC Rule 3745-17-07(A)

Source(s): Quarterly Deviation and Compliance Monitoring Report: Third Quarter 2009
August 13, 2009 Boiler D malfunction notice
August 24, 2009 Boiler D malfunction notice
September 22, 2009 Boiler D malfunction notice

Reported By	Date	Start Time	Duration	Opacity	
ArcelorMittal	08/12/09	09:06	6 minutes	21.7%	Reported malfunction
ArcelorMittal	08/12/09	09:12	6 minutes	21.4%	Reported malfunction
ArcelorMittal	08/12/09	10:48	6 minutes	28.0%	Reported malfunction
ArcelorMittal	08/15/09	15:48	6 minutes	37.2%	Soot blowing
ArcelorMittal	08/15/10	15:54	6 minutes	41.8%	Fields tripped, adjusted electrical load
ArcelorMittal	08/16/09	01:36	6 minutes	22.8%	Soot blowing
ArcelorMittal	08/17/09	15:54	6 minutes	24.6%	Soot blowing
ArcelorMittal	08/17/09	16:00	6 minutes	37.0%	Soot blowing
ArcelorMittal	08/20/09	02:24	6 minutes	22.7%	Soot blowing
ArcelorMittal	08/20/09	21:18	6 minutes	77.6%	Reported malfunction
ArcelorMittal	09/18/09	06:48	6 minutes	45.9%	Reported malfunction
ArcelorMittal	09/18/09	06:54	6 minutes	86.9%	Reported malfunction
ArcelorMittal	09/18/09	07:00	6 minutes	46.3%	Reported malfunction
ArcelorMittal	09/19/09	04:48	6 minutes	89.7%	Adjusted fuel/air ratio
ArcelorMittal	09/21/09	15:36	6 minutes	62.0%	#4 field tripped, power restored
ArcelorMittal	09/21/09	19:42	6 minutes	34.2%	Adjusting fans, adjusted fuel/air ratio
ArcelorMittal	09/21/09	19:48	6 minutes	21.6%	Adjusted fuel/air ratio

Reported By	Date	Start Time	Duration	Opacity	
ArcelorMittal	09/21/09	20:06	6 minutes	22.9%	#4 field tripped, power restored; [boiler idles on 09/22, conducted internal precipitator inspection, repaired wires]

j. #2 Ladle Metallurgy Facility (P267) Operating and Inspection Requirements

Regulated by: Iron and Steel NESHAP, 40 C.F.R. § 63.7842
Title V Permit, Part III.A.1.1

Source: Iron and Steel NESHAP Semiannual Report: First Half 2007

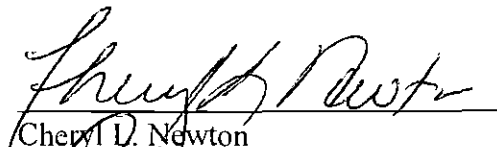
Reported By	Date	Count
ISG Cleveland	April 16 - June 26, 2007	21 days Failed to document operations at the LMF including failing to record pressure drops and information relating to startups, shutdowns and malfunctions

IV. ENVIRONMENTAL IMPACT OF THE VIOLATIONS

- a. Violation of the opacity standards increases public exposure to unhealthy particulate matter. Particulate matter, especially fine particulate, contributes to respiratory problems, lung damage and premature deaths.
- b. Ground level concentrations of SO₂ contribute to respiratory illness, particularly in children and the elderly and aggravate existing heart and lung diseases. Peak levels of SO₂ in the ambient air can cause temporary breathing difficulty for people with asthma who are active outdoors. Longer-term exposures to high levels of SO₂ gas and particles cause respiratory illness and aggravate existing heart disease.
- c. Volatile organic compounds (VOCs) react with nitrogen oxides in the presence of sunlight to form ground-level ozone, which contributes to respiratory problems such as increased susceptibility to respiratory infection, pulmonary inflammation, painful deep breathing, aggravated asthma and reduced lung capacity.

- d. Violations of the monitoring, recordkeeping, reporting and permitting requirements prevent the EPA from knowing whether a facility has maintained compliance with the applicable regulatory and emission standards.

10/21/11
Date


Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent the Notice of Violation and Finding of Violation by

Certified Mail, Return Receipt Requested, to:

Richard M. Zavoda, Environmental Manager
ArcelorMittal Cleveland Inc.
3060 Eggers Avenue
Cleveland, OH 44105

I also certify that I sent a copy of the Notice of Violation and Finding of Violation by First

Class Mail to:

George P. Baker
Chief of Air Pollution Enforcement
Department of Public Health & Welfare
Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114

on the 26th day of October 2011.



Betty Williams
Administrative Program Assistant
Planning and Administration Section

Certified Mail Receipt Number: 70091680 0000 7672 8249